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Federal Communications Commission  
Office of the Secretary

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268 ✓
and Their Impact on the	)	
Existing Broadcast Service	)	
	)	
Review of Technical and	)	
Operational Requirements:	)	
Part 73-E, Television	)	
Broadcast Stations	)	
	)	
Reevaluation of the UHF	)	
Television Channel and	)	
Distance Separation	)	
Requirements of Part 73 of	)	
the Commission's Rules	)	

JOINT REPLY COMMENTS  
AND REQUEST FOR SETTING ADDITIONAL COMMENT DATES

The Association of Maximum Service Telecasters, the National Association of Broadcasters, and the National Cable Television Association hereby submit these joint reply comments and request that the Commission establish additional dates for comments in this docket to provide opportunities for further comment on the issues raised in the Notice of Inquiry ("NOI") as information on advanced television ("ATV") research and developmental efforts becomes available over the coming year.

The initial round of comments in response to the Commission's comprehensive NOI provided a great deal of useful information on emerging ATV technologies, developmental efforts, research into the feasibility of

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various spectrum options, and the potential implications of ATV for local broadcasters, cable entities, the satellite industry, and the American public in general. Nonetheless, there was virtually unanimous agreement among the commenters that there is currently insufficient information to resolve the questions raised in the NOI. As the Commission noted in the NOI, ATV developments are still at an early stage. 2 FCC Rcd. 5127 (1987). Further development and testing of systems, field testing of signal robustness over different transmission paths, and other research and evaluation efforts are necessary before the Commission can make decisions regarding these questions.

The comments also demonstrate that efforts to conduct the necessary development, testing and evaluation are already well underway. Development of new ATV formats and transmission technologies that are designed to be appropriate for delivery by local broadcasters and cable systems have been going on for some time and several of the system developers expect to have completed prototype hardware for demonstration, or computer simulations of new transmission designs, before the end of 1988.<sup>1/</sup> ATSC is conducting propagation tests which are designed to provide

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<sup>1/</sup> See, e.g., Comments of Dr. William Schrieber, at 2-2; Comments of North American Phillips, at 48; Comments of the New York Institute of Technology Science and Technology Research Center, at 12; Comments of Del Rey Group, Inc.

important general (as opposed to system-specific) information on the feasibility, interference problems, and multipath considerations involved in using various frequencies and transmission formats which have been proposed for ATV.<sup>2/</sup> The initial results from these tests are expected to be ready before the end of the coming year. ATSC will also be conducting studies into propagation characteristics of signals on cable television system networks and the technical problems that may be involved in transmitting ATV systems over cable.<sup>3/</sup> Finally, additional studies on the availability of spectrum in various candidate bands identified by the Commission will be completed by the end of the 1988.<sup>4/</sup>

It is unlikely that these initial tests will yield sufficient information to allow the Commission to make definitive decisions on the issues raised in the NOI. Further testing, particularly actual field testing of specific candidate ATV systems over-the-air and over cable

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<sup>2/</sup> Comments of ATSC, at 8-9.

<sup>3/</sup> Comments of NCTA, at 13-15.

<sup>4/</sup> MST has already set forth plans to expand the spectrum surveys it has already completed, see Comments of MST, at 40-41, and the Commission has charged its Advanced Television System Advisory Committee with making fundamental parameters and spectrum requirements the primary focus of its initial report. 52 Fed. Reg. 38523, 38524 (October 16, 1987).

systems and subjective testing to compare the performance of various systems will be necessary before the Commission can take action on these issues.

Nonetheless, these developmental efforts and tests, as well as others that are underway, will undoubtedly yield crucial information for the Commission's inquiry that will be worthy of further comment and analysis. Up to now, however, no specific dates for further comment on the issues raised in this docket have been established. Accordingly, the undersigned request that the Commission issue a further order providing for three additional rounds of comments as described below. Specific dates are suggested for the first two rounds of comments; these may have to be adjusted as intervening developments require. No date is suggested for the third round of comments because it is too early to determine when this date should be.

The Commission has already indicated its intention to solicit comments on the initial report of the Advanced Television Systems Advisory Committee after it becomes due in May, 1988.<sup>5/</sup> It is obviously appropriate that the comments on the report be made a part of this proceeding. We suggest a comment deadline for this purpose of July 29, 1988.

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<sup>5/</sup> Further Sharing of the UHF Television Band by Private Land Mobile Radio Services, 2 FCC Rcd. 6441, 6442 (1987).

In addition, it is evident that by the end of 1988 there will be considerably more information on the performance and characteristics of the prototype ATV systems scheduled to be tested during the coming year, the initial results of propagation and transmission path tests now being conducted, and the results of surveys of candidate spectrum. The Commission should establish a second additional deadline of January 30, 1989 for comments on these new developments and how they relate to the issues raised in the NOI.

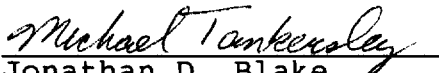
A third set of dates for comment will undoubtedly be necessary in the future as the results of tests of specific systems and their transmission characteristics become available. It is too early, however, to anticipate when dates for comment on these more specific tests will be appropriate.

The undersigned therefore request that the Commission establish dates for two further rounds of

comments in this proceeding -- July 29, 1988 and January 30, 1989 -- and indicate that it will also provide for comments on field test results at a date to be established in the future.

Respectfully submitted,


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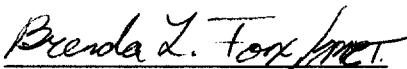
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